

2/4/1993

## NARRATIVE INSPECTION REPORT

**Facility:** Burlington Environmental, Inc. - Pier 91 Facility

**ID #:** WAD 00081 2917

**Address:** 2001 West Garfield St.  
Seattle, WA 98119

**Date of Inspection:** February 4, 1993

**Report prepared by:** Sylvia Burges  
RCRA Compliance Section  
EPA Region 10  
Seattle, WA 98101  
(206) 553-1254

2/18/93

**Inspectors:** Sylvia Burges, EPA Region 10  
Dave Croxton, EPA Region 10

**Facility representatives:** Nate Mathews, Plant Manager  
John Stiller, Regulatory Affairs  
Julie Slocum, Regulatory Affairs

**Purpose**

This inspection was conducted to gain current information regarding Facility compliance with applicable hazardous waste management requirements as set forth in the facility's permit, in Chapter 173-303 WAC Dangerous Waste regulations and the Resource Conservation and Recovery Act, as amended (RCRA).

**Introduction**

The Washington Department of Ecology (Ecology) has primary responsibility for conducting RCRA inspections to document the compliance status of facilities in accordance with WAC requirements contained in Chapter 173-303. EPA implements hazardous waste management requirements set forth in the Hazardous and Solid Waste Amendments of 1984 (HSWA) in those states not authorized for this portion of RCRA. Ecology has not received final authorization for HSWA. EPA also conducts additional inspections under its CERCLA offsite facility policy, which requires that a facility have been inspected within the last six months to be eligible to receive CERCLA-generated wastes. Because the facility is owned by a local governmental authority (Port of Seattle), EPA is required to conduct annual inspections.

The most recent Compliance Evaluation Inspection (CEI) at this facility was conducted by Ecology on May 15, 1992; therefore, the facility was due for a CEI under the offsite

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policy. This inspection was conducted to determine the present compliance status of Burlington Environmental, Inc. (Burlington's) Pier 91 Facility with RCRA.

### **Facility Background/Regulatory Status**

Burlington first notified EPA of its hazardous waste activity at the Pier 91 facility on August 13, 1980, identifying itself as both a fully-regulated generator and as an owner/operator of a treatment, storage, or disposal facility. A Part B operating permit was issued by Ecology and became effective August 26, 1992; several provisions of the permit are currently under appeal.

Current operations include waste oil blending and treatment, and treatment of oily water and emulsified wastewaters. Pier 91 also treats a small amount of wastewater containing F-listed wastes from their Georgetown facility. All materials are received in bulk shipments.

### **Compliance History**

During the May 15, 1992 CEI the only violations noted concerned lack of hazardous waste labels on satellite accumulation containers in the two testing labs.

Burlington is currently conducting studies to define the nature and extent of contamination due to past releases on the site as part of the Part B permit corrective action requirements.

### **Inspection Coordination**

Sylvia Burges contacted Josh Chaitin of Ecology to determine whether he was interested in participating in the CEI; he indicated that he would be unable to participate. Doug Brown, Ecology permit writer was informed by Dave Croxton of the upcoming CEI at this facility; he did not indicate any interest in participating.

### **FACILITY INSPECTION**

#### **Opening Conference**

Dave Croxton, and I arrived at the Pier 91 plant on February 4, 1992 at 9:10 AM and asked to see Nate Mathews. I presented my credentials to Mr. Mathews and informed him that we were conducting a routine compliance inspection of the facility's hazardous waste management activities. While waiting for representatives from the corporate office to arrive, Mr. Mathews described current operations at the facility.



We asked about the facility's efforts in waste minimization. Burlington has a written Waste Minimization Plan, an engineer whose main responsibility is to work with the Pier 91 and Tacoma facilities to improve treatment processes, and is working to reduce waste generation, primarily through process modification.

#### **Plant tour**

Next we indicated that we would like to proceed with the tour of the facility. We went first to area where arriving trucks are tested and offloaded. All loads are tested using the chlor-detect test prior unloading. The area appeared generally neat and clean. We next entered the lab that Burlington uses to run fingerprint tests to confirm that the waste matches the profile on the manifest and to perform the chlor-detect test. The lab appeared clean and orderly and the accumulation drum was appropriately marked and dated.

We then proceeded into the tank yard where the oils, oily wastewater and the F-listed wastewater are treated in one of several tanks with inorganic salts and flocculation. Wastewater is discharged to Metro under a pretreatment permit and the slurry from the bottoms of tanks is pumped into vacuum trucks when the salts have been spent; this waste is taken to Kent or Georgetown for further treatment.

The tank yard area contains a number of storage and treatment tanks for wastewater and oily wastes containing significant levels of organics and is therefore subject to the requirements of 40 C.F.R. part 265 subpart BB. Equipment in this area was not marked as required by 40 C.F.R. 265.1050(c); no physical identification was observed, a potential violation of 40 C.F.R. 265.1050(c).

#### **Review of records**

We asked to review manifests for 2 months -- I randomly selected incoming manifests for November and outgoing manifests for September. I also asked Mr. Mathews whether Burlington was currently importing or exporting any waste, since questions regarding imports had arisen during a prior inspection; he replied that Burlington was not currently importing or exporting any waste. Review of the outgoing manifests revealed one shipment of parts cleaner solvent (D001, D039) to Safety Kleen without the LDR notification required in accordance with 40 C.F.R. §268.7 (#38765; see Attachment A). The other eight manifests, including three additional Safety Kleen manifests, included copies of the required LDR notification. Shortly after I asked Mr. Mathews about the omission, one of his staff brought in a faxed copy of the manifest that was on file at the Safety Kleen facility; the LDR notification was attached.

We reviewed the part BB air emissions monitoring inspection log and obtained copies of 2 logs in which different recording schemes are used. Mr. Mathews indicated that because all of the equipment was in heavy liquid service, the standard daily RCRA leak detection inspection also meets the applicable requirements under part BB.

### **Closing Conference**

We indicated that the only potential violation observed during the inspection had been the missing LDR Notification, and that we had some doubts about the extent of compliance with the requirements of part BB. We left the facility at about 12:30 PM.

### **Potential Violations**

1. In the tank yard, equipment subject to 40 C.F.R. part 265 subpart BB was not marked in accordance with §1050(c), a potential violation of 40 C.F.R. §265.1050(c).

2. Recordkeeping requirements for equipment subject to 40 C.F.R. part 265 subpart BB was not in accordance with the requirements §265.1064 in that:

- a. A full list of affected equipment (as required by §265.1064(b)(1)(i)) was not in logbook. A limited inventory could be inferred from the maps for valves and permanent pumps; however, portable pumps, flanges, hoses were not shown on maps, and Burlington appears to have no record showing that they have ever been inspected or leak tested.
- b. Percent-by-weight total organics in the hazardous waste stream at each piece of equipment, as required by §265.1064(b)(1)(iv), was not recorded.

These omissions are potential violations of 40 C.F.R. §265.1064.

3. One shipment of parts cleaner solvent (D001, D039) to Safety Kleen without the LDR notification required in accordance with 40 C.F.R. §268.7, a potential violation of 40 C.F.R. §268.7.

ATTACHMENTS

A. MANIFEST # 38765

B. AIR EMISSIONS COMPLIANCE INSPECTION LOG FOR 11/12/91, 1/10/91

ATTACHMENT A

MANIFEST # 38765



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-92

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>MAD 000812917</b>		Manifest Document No. <b>38765</b>		2. Page 1 of 1 Information in the shaded areas is not required by Federal law.																																								
3. Generator's Name and Mailing Address <b>CHEMICAL PROCESSORS 2001 W GARFIELD SEATTLE, WA</b> <b>PIER 91 - BOX C105 98119</b>						A. State Manifest Document Number																																								
						B. State Generator's ID																																								
4. Generator's Phone ( <b>206</b> ) <b>284-2450</b>						C. State Transporter's ID																																								
5. Transporter 1 Company Name <b>SAFETY-KLEEN CORP.</b>		6. US EPA ID Number <b>MAD 000712042</b>		D. Transporter's Phone <b>206 775-7030</b>		E. State Transporter's ID																																								
7. Transporter 2 Company Name		8. US EPA ID Number		F. Transporter's Phone		G. State Facility's ID																																								
9. Designated Facility Name and Site Address <b>SAFETY-KLEEN CORP. 6303 212TH ST SW SUITE B LYNNWOOD, WA 98036</b> <b>7-092-01</b>						H. Facility's Phone <b>206 775-7030</b>																																								
						10. US EPA ID Number <b>MAD 000712042</b>																																								
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:5%;">HM</th> <th style="width:65%;">Description</th> <th style="width:10%;">No.</th> <th style="width:10%;">Type</th> <th style="width:10%;">Total Quantity</th> <th style="width:10%;">Unit Wt/Vol</th> <th style="width:10%;">Waste No.</th> </tr> </thead> <tbody> <tr> <td>a.</td> <td><b>X</b> <b>WASTE COMBUSTIBLE LIQUID, N.O.S. {MINERAL SPIRITS} NA1993 PGIII {D001} {ERG#27}</b></td> <td><b>1</b></td> <td><b>DM</b></td> <td><b>45</b></td> <td><b>P</b></td> <td><b>D001 D039</b></td> </tr> <tr><td>b.</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>c.</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>d.</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table>				HM	Description	No.	Type	Total Quantity	Unit Wt/Vol	Waste No.	a.	<b>X</b> <b>WASTE COMBUSTIBLE LIQUID, N.O.S. {MINERAL SPIRITS} NA1993 PGIII {D001} {ERG#27}</b>	<b>1</b>	<b>DM</b>	<b>45</b>	<b>P</b>	<b>D001 D039</b>	b.							c.							d.							12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
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				b.																																										
				c.																																										
d.																																														
J. Additional Descriptions for Materials Listed Above <b>I(A) D018</b>						K. Handling Codes for Wastes Listed Above																																								
15. Special Handling Instructions and Additional Information <b>9232 42779983 638765 7-092-01-7204 0501</b> <b>IF UNDELIVERABLE, RETURN TO GENERATOR FOR RECYCLE.</b> <b>EMERGENCY RESP#708-888-4660 24 HR SKDOT# A: 501 B: C: D:</b>																																														
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																																														
Printed/Typed Name <b>Marty Dole</b>				Signature <i>Marty Dole</i>		Date <b>8/7/92</b>																																								
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>John KAS</i>		Date <b>8/7/92</b>																																								
Printed/Typed Name <b>John KAS</b>				Signature <i>John KAS</i>		Date <b>8/7/92</b>																																								
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date																																								
Printed/Typed Name				Signature		Date																																								
19. Discrepancy Indication Space																																														
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.																																														
Printed/Typed Name <b>Bob Matthews</b>				Signature <i>Bob Matthews</i>		Date <b>8/7/92</b>																																								





7-092-01

## NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

EPA ID NO. WAD000712042  
(DESIGNATED FACILITY)TO: SAFETY-KLEEN CORP.  
(DESIGNATED FACILITY)

6303 212TH ST SW SUITE B

ADDRESS: LYNNWOOD, WA 98036

Under manifest number 38765, the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR Part 268.7, the generator hereby provides notice that the waste is restricted from land disposal. A copy of this form must be kept by the generator and facility for five (5) years from the date of waste shipment.

In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted from land disposal. I am a small quantity generator (100-1,000 kg/mo) in accordance with 40 CFR 268.7. This notice applies to all waste shipments under my service contract with Safety-Kleen Corp. It covers today's shipment on manifest No. \_\_\_\_\_, or sales/service acknowledgement No. \_\_\_\_\_, and all subsequent shipments.

A copy of this notice will be maintained with the service contract(s) or sales/service acknowledgment(s) for five (5) years beyond the termination of the service contract.

✓	WASTE NAME	EPA * WASTE CODE	THE WASTE MAY CONTAIN THE FOLLOWING RESTRICTED CONSTITUENTS	TREATMENT STANDARD (mg/l) OR METHOD (FOR NON-WASTE WATER)
PLEASE CHECK THE APPROPRIATE BOXES	<input checked="" type="checkbox"/> Waste Petroleum Naphtha	D001, D018, D039,	Ignitable Liquid (High TOC Subcategory) Halogenated Organic Compounds (HOC's) $\geq 1000$ mg/l Benzene Tetrachloroethylene	Incineration (INCIN), fuel substitution (FSUBS) or recovery (RORGS) INCIN Not Established Not Established
	<input type="checkbox"/> Waste Petroleum Naphtha (sludges from Safety-Kleen Service Center Operations)	D001, D006, D007, D008, D039,	All of the above, plus: — Cadmium — Chromium — Lead — Tetrachloroethylene	1.0 5.0 5.0 Not Established
	<input type="checkbox"/> Waste Compound Cleaning Liquid/ Immersion cleaner 609	F002, F004, D006, D007, D008, D022,	Cresylic Acid 1, 2-dichlorobenzene Methylene chloride — Cadmium — Chromium — Lead — Chloroform	0.75 0.125 0.96 1.0 5.0 5.0 Not Established
	<input type="checkbox"/> Waste Compound Cleaning Liquid/ Immersion Cleaner 699	D006, D007, D008, D018, D021, D027, D039, D040,	HOC's $\geq 1000$ mg/l — Cadmium — Chromium — Lead — Benzene — Chlorobenzene — 1, 4-Dichlorobenzene — Tetrachloroethylene — Trichloroethylene	INCIN 1.0 5.0 5.0 Not Established Not Established Not Established Not Established Not Established
	<input type="checkbox"/> Waste Perchloroethylene	F002,	Tetrachloroethylene	0.05
	<input type="checkbox"/> Waste Trichlorotrifluoroethane	F002,	Trichlorotrifluoroethane	0.96
	<input type="checkbox"/> Waste 1,1,1 Trichloroethane	F002,	1, 1, 1 Trichloroethane	0.41
	<input type="checkbox"/> Waste Paint Related Material	F005, F003, D001, D006, D007, D008,	Acetone Methyl Ethyl Ketone Methyl Isobutyl Ketone Toluene Xylene Methanol Ignitable Liquid (High TOC Subcategory) Cadmium Chromium Lead (TOC Subcategory)	0.59 0.75 0.33 0.33 0.15 0.75 INCIN, FSUBS, or RORGS 1.0 5.0 5.0
	<input type="checkbox"/> Waste Antifreeze	D008, D039,	Lead Tetrachloroethylene	5.0 (This is a non-waste water) Not Established

The constituent composition is based on knowledge of the waste (via Material Safety Data Sheets for the chemical(s) used, and the process which created the waste).

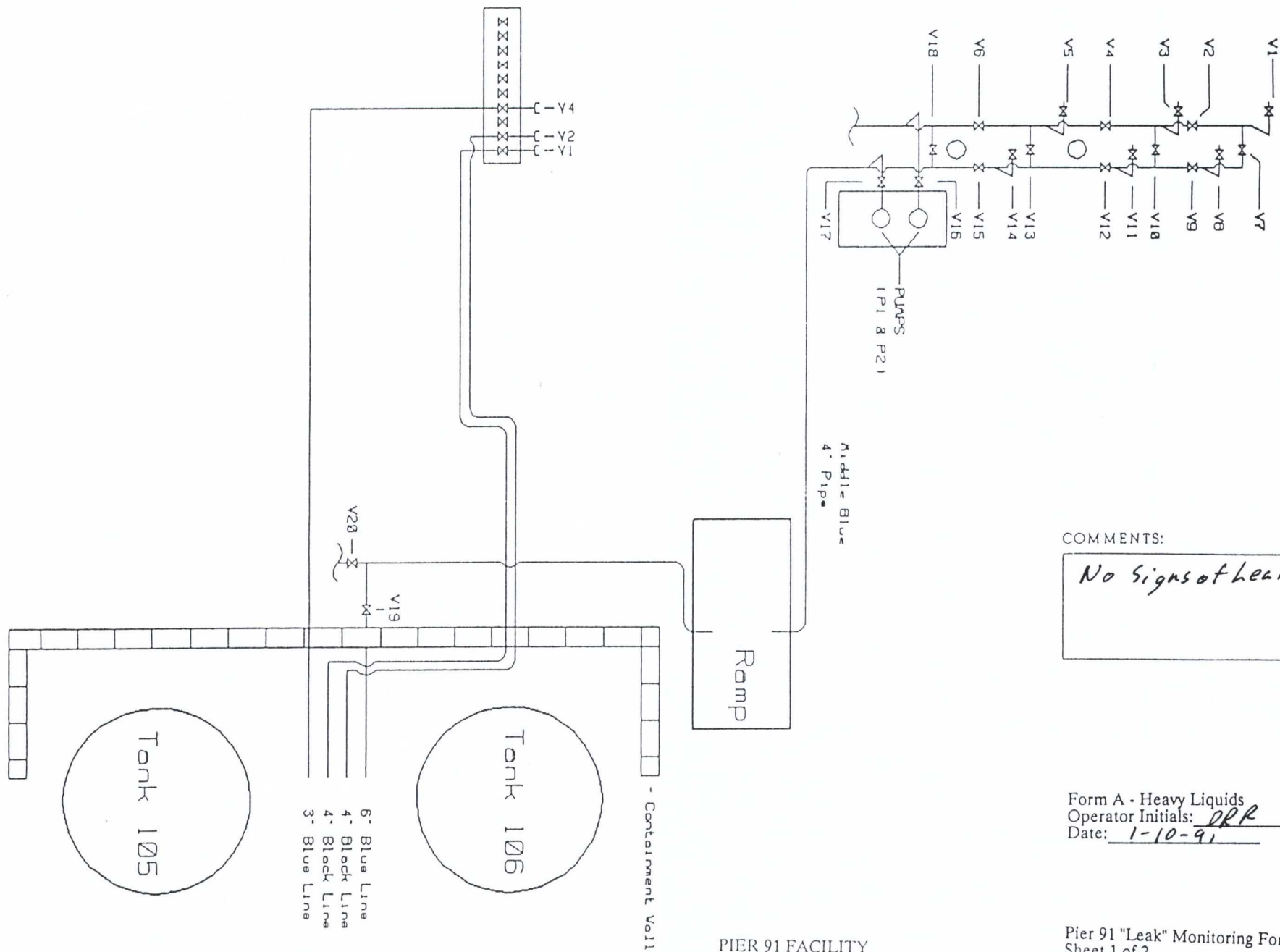
\*These treatment standards do not preclude reclamation prior to final disposition.

Generator Company: BURLINGTON ENVIRONMENTAL7-092-01-7204 0501 638765  
EPA ID NO.: WAD000812917Generator's Signature: XDate: 8-7-92Printed Name and Title of Generator: Marty HollawayHazardous Waste Technician



**ATTACHMENT B**

**AIR EMISSIONS COMPLIANCE INSPECTION LOG FOR 11/12/91, 1/10/91**

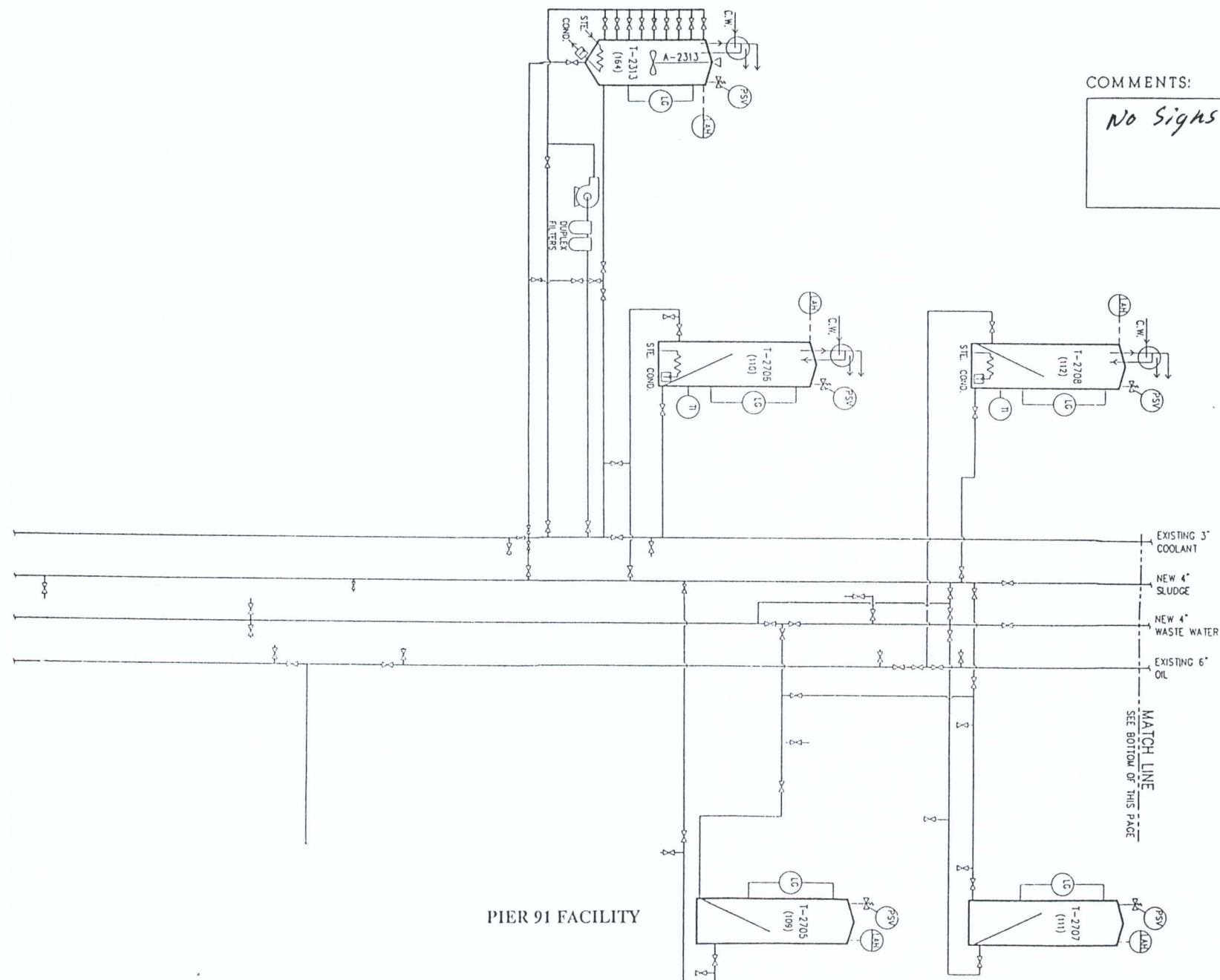


COMMENTS:

*No Signs of Leaks*

Form A - Heavy Liquids  
Operator Initials: DRR  
Date: 1-10-91



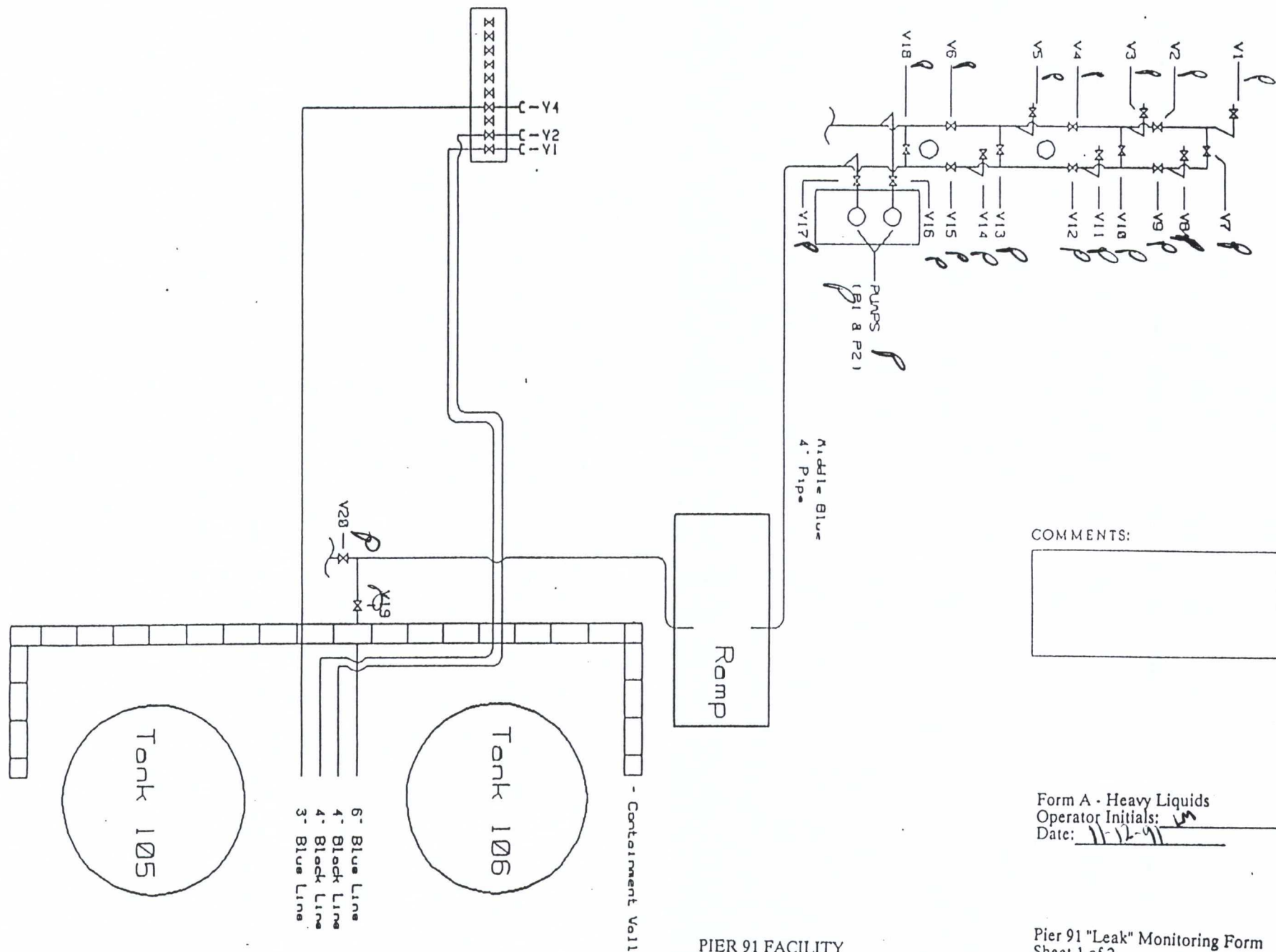


COMMENTS:

*No Signs of Leaks*

Form B - Heavy Liquids  
Operator Initials: *PRR*  
Date: *1-10-91*

Pier 91 "Leak" Monitoring Form  
Sheet 2 of 2



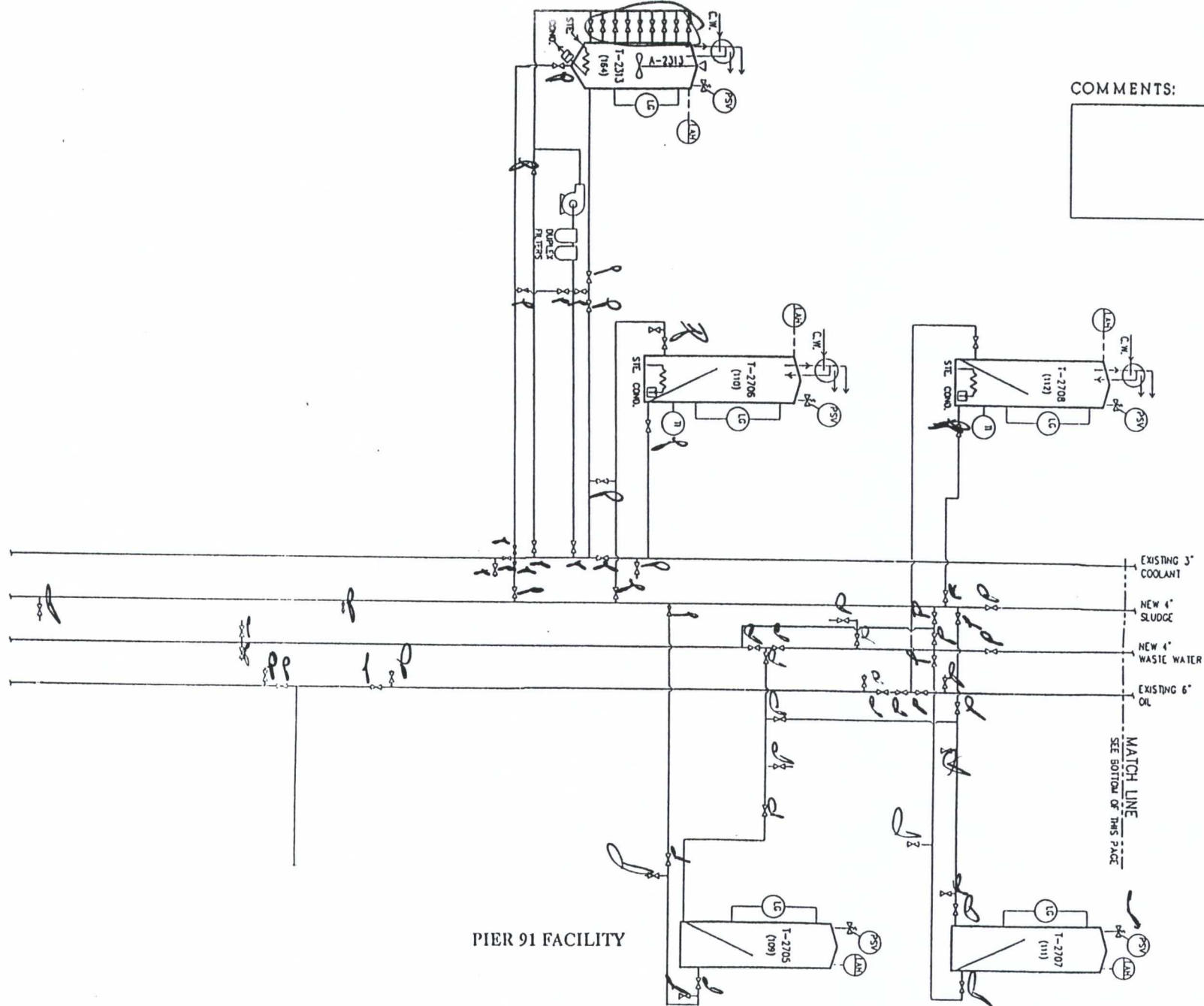
COMMENTS:

Form A - Heavy Liquids  
Operator Initials: W  
Date: 11-12-91

Pier 91 "Leak" Monitoring Form  
Sheet 1 of 2



COMMENTS:



PIER 91 FACILITY

Form B - Heavy Liquids  
Operator Initials: LS  
Date: 11-18-11

Pier 91 "Leak" Monitoring Form  
Sheet 2 of 2